

Exhibit H

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

DR. AMY R. WOODS

PLAINTIFF

VS

CIVIL ACTION NO. 3:19-CV-00234-NBB-RP

MHM HEALTH PROFESSIONALS, LLC, D/B/A
CENTURION PROFESSIONALS;
MANAGEMENT & TRAINING CORPORATION
JESSE WILLIAMS, INDIVIDUALLY;
AND JOHN DOES 1-9

DEFENDANTS

ZOOM DEPOSITION OF JESSE WILLIAMS

Taken at the Instance of the Plaintiff
With All Parties Appearing by Zoom Videoconferencing
On August 3, 2020
At 12:31 p.m.

REPORTED BY: SHARRON F. ALLEN, CSR, RPR
CSR NO. 1144

1 Q. Your job is not just violence, though,
2 of inmates; it's violence, security of your
3 officers and the public. Right?

4 A. Very much so, sir.

5 Q. You guys have pretty violent people in
6 your prison?

7 A. Yes, sir.

8 MR. WAIDE: Object to the form. It's
9 leading.

10 BY MR. LONG-DANIELS:

11 Q. Tell us the most violent level of
12 prisoner that you have there.

13 A. Well, I have zero inmate at my facility
14 that are there for jaywalking. I can assure you
15 of such. Some of the most violent inmates that
16 I have are what we call "long-term segregation
17 offenders" or maximum security offenders. Some
18 of these offenders are housed in Mississippi
19 Department of Corrections at Marshall for
20 violent crimes -- murder, rape, ag murder,
21 burglary -- but they are classified as long-term
22 segregation offenders because, while they've
23 been incarcerated, they've seriously assaulted
24 staff or other offenders. That has raised their
25 security level from medium or close to long-term